

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

MICHAEL MCKENZIE, individually and)
doing business as AMERICAN IMAGE ART,)
an unincorporated dba,)

Plaintiff,)

v.)

JAMES W. BRANNAN, as personal)
representative of THE ESTATE OF ROBERT)
INDIANA, and AARON M. FREY, only in his)
official capacity as Attorney General of the)
State of Maine)

Defendants.)

Civil Action No.: 2:20-cv-00262-NT

**REPLY OF DEFENDANT BRANNAN IN SUPPORT OF ITS MOTION *IN LIMINE* TO
EXCLUDE EVIDENCE ABOUT ANY ALLEGED FORGERY OF ARTWORK OR
DISCUSSIONS ABOUT ROBERT INDIANA SIGNING ARTWORK**

Defendant James W. Brannan (“Defendant,” or “Brannan”), by and through his counsel, hereby submits this reply memorandum in support of his motion to exclude Plaintiff’s proposed evidence concerning any alleged forgery of artwork or discussions about Robert Indiana signing artwork.

Plaintiff does not dispute that any forgery-related evidence is not relevant to any of these issues before the Court. *See* Pl.’s Resp. 7.

Accordingly, Defendant Brannan requests that the Court grant the motion to exclude forgery-related evidence.

JAMES W. BRANNAN,

By his attorneys,

DATED: July 15, 2022

/s/ Seth W. Brewster

Seth W. Brewster, Esq., Bar No. 3741
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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2022, I electronically filed Defendant Brannan's Reply memorandum in support of his Motion *in Limine* using the CM/ECF system, which will send notification of such filing(s) to all counsel of record.

/s/ Seth W. Brewster
Seth W. Brewster, Esq.